

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Jesus Gomez,

Plaintiff,

v.

Officer Rodarte #5319 and Officer Vincent Ryan,

Defendants.

CASE NO. 20-CV-6051

JUDGE GETTLEMAN

MAGISTRATE JUDGE CUMMINGS

JOINT DISCOVERY STATUS REPORT

1. On December 21, 2021, the Court requested that attorney Robert L. Graham represent plaintiff Jesus Gomez in this matter in accordance with Mr. Graham's trial bar commitment under Local Rule 83.38.

2. On March 3 and 4, 2022, Plaintiff's counsel appeared in this case.

3. On March 7, 2022, counsel for both parties appeared at a telephonic status hearing and Plaintiff's counsel represented that they had cleared conflicts and were prepared to proceed with the representation.

4. The same day, the Court set a telephonic status hearing for May 13, 2022.

5. On April 5, 2022, the Court ordered the parties to submit a joint status report setting forth what discovery remains and a proposed schedule for the completion of discovery.

6. On April 7, 2022, counsel for the parties spoke by phone and discussed the status of discovery in this case, as well as a proposed schedule.

7. In 2021, the parties served initial disclosures under Federal Rule of Civil Procedure 26(a)(1), and defendants served interrogatories and requests for the production of documents.

Plaintiff produced some documents, but he did not respond to defendants' written discovery requests.

8. Considering the turnover of counsel on both sides, and based on counsel's conversation, the parties agreed to start the discovery process over.

9. The parties thus propose the following discovery schedule:

- a. May 13, 2022: Deadline for Plaintiff to move to amend his complaint
- b. June 13, 2022: Deadline to serve initial disclosures under Rule 26(a)(1)
- c. July 11, 2022: Deadline to serve written discovery requests
- d. October 10, 2022: Deadline to serve expert disclosures under Rule 26(a)(2)
 - i. Disclosure of experts will include a report fully in compliance with Rule 26(a)(2)(B).
 - ii. Rebuttal expert or evidence shall be disclosed within 30 days of the challenged expert's disclosure.
 - iii. Depositions of experts shall be taken within 60 days of designation.
- e. December 12, 2022: Deadline for all fact discovery.

Dated: April 12, 2022

Respectfully submitted,

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